

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE WACHOVIA EQUITY
SECURITIES LITIGATION

No. 08 Civ. 6171 (RJS)

ECF Case

**NOTICE OF LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Proposed Settlements and Providing for Notice dated August 9, 2011, and upon the Declaration of Ira M. Press in Support of Proposed Class Settlement, Plan of Allocation and Award of Attorneys' Fees and Expenses, dated April 27, 2012; the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses; and all other papers and proceedings herein, Lead Counsel will and do hereby move this Court on June 1, 2012, at 11:00 a.m. in the Courtroom of the Honorable Richard J. Sullivan, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for entry of a Judgment approving the Settlements as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

Dated: April 27, 2012

Respectfully Submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
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